



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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**BY ECF**

September 9, 2020

Hon. Victor Marrero, United States District Judge  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

Re: *Jones et al. v. United States Postal Service et al.*, No. 20 Civ. 6516 (VM)

Dear Judge Marrero:

This Office represents the defendants in the above-referenced case. We write with the consent of Plaintiffs' counsel respectfully to request a short *nunc pro tunc* extension of Defendants' deadline to file their papers in opposition to Plaintiffs' motion for a preliminary injunction (ECF No. 19). Defendants have filed all of their opposition papers (ECF Nos. 22-33). However, while Defendants began their filing before midnight, due to late-stage difficulties in obtaining signed copies of some of Defendants' supporting declarations, as well as subsequent ECF error messages that necessitated multiple attempts at filing many of Defendants' supporting declarations, Defendants did not complete their filing until approximately 12:35 a.m. this morning. Therefore, we respectfully request a *nunc pro tunc* 35-minute extension of Defendants' deadline to file these opposition papers.

We have conferred with Plaintiffs' counsel, who graciously consented to this request. We thank the Court for its consideration of this request.

Respectfully,

AUDREY STRAUSS  
Acting United States Attorney for the  
Southern District of New York  
*Attorney for Defendants*

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